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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

Case No. 4:18-cv-06753-PJH

This Document Relates to:  
ALL ACTIONS

**DECLARATION OF JAMES TAYLOR-  
COPELAND IN SUPPORT OF SEALING  
PURSUANT TO LOCAL RULES 79-5(C)  
& (E)**

**DECLARATION OF JAMES TAYLOR-COPELAND**

1. I am an attorney in the law firm of Taylor-Copeland Law, and counsel for Lead Plaintiff Bradley Sostack. I have personal knowledge of the matters set forth herein. If called as a witness, I could and would testify competently thereto.

2. I respectfully submit this declaration in support of Plaintiffs' Administrative Motion to Seal materials submitted by Defendants in connection with their Opposition to Lead Plaintiff's Motion for Class Certification

3. The documents below contain and describe information that has been designated as "CONFIDENTIAL" pursuant to the parties' Stipulated Protective Order. *See* ECF No. 143.

Documents to be Sealed	Portions to Be Sealed
Defendants' Opposition to Class Certification	<ul style="list-style-type: none"> <li>Page 7, lines 3-7.</li> <li>Page 18, lines 7-10.</li> <li>Page 18, fn. 15.</li> </ul>
Ex. 6, Excerpts of Sostack Deposition Transcript	Entirety of document
Ex. 8, Plaintiff's Poloniex Trading Records and Know-You-Customer Information	Entirety of document

4. The excerpts of the transcript of Mr. Sostack's deposition included in Exhibit 6 contain numerous references to Plaintiff's private financial affairs, including information regarding a limited liability company created by Plaintiff, Plaintiff's ownership of various digital assets, Plaintiff's use of wallets to store digital assets, and specific transactions in various digital assets.

5. Exhibit 8 contains Plaintiff's detailed trading records and know-your-customer information on the Poloniex exchange. The trading records reflect Plaintiff's confidential financial affairs, including the timing of Plaintiff's deposits and purchases of both XRP and various other digital assets. Exhibit 8 also contains extremely sensitive personally identifiable information,

1 including a photocopy of Plaintiff's passport and a record of all IP addresses used to access the  
2 Poloniex exchange.

3 6. The redacted portions of the Joint Letter Brief contain detailed references to (a)  
4 excerpts of the transcript of Plaintiff's deposition (Exhibit 6) and Plaintiff's trading records on the  
5 Poloniex exchange (Exhibit 8). Both the trading records and references to the deposition transcript  
6 reflect Plaintiff's private financial affairs, including the timing of Plaintiff's purchases of both  
7 XRP and various other digital assets and the circumstances surrounding those purchases.

8 7. If these documents are not properly sealed, Plaintiff's personal and private financial  
9 records will become part of the public record.

10 I declare under penalty of perjury that the foregoing is true and correct.

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13  
14 Dated: 2/10/2023

15 By:   
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